

DeMaria, Eva

From: MCCLINCY Matt <MCCLINCY.Matt@deq.state.or.us>
Sent: Monday, December 07, 2015 10:03 AM
To: DeMaria, Eva; Sheldrake, Sean
Cc: SUTTER Jennifer; LARSEN Henning; Michael Allen (allenmc@cdmsmith.com)
Subject: EVRAZ Issues
Attachments: Att D Issue paper for Fe and Mn nov16.docx

Hi Eva and Sean,

I was out the end of last week, but I wanted to forward some info and reinforce questions that Jennifer asked to help make our meeting more productive this afternoon.

As we have discussed, DEQ does not consider the shallow groundwater at most of Portland Harbor upland sites to have a drinking water beneficial use. This is an outcome of the process laid out in our cleanup program statutes, and we recognize that it might not square with EPA CERCLA. There has been quite a bit of back and forth over the years about the MCL issue. Up until the recent Mn discussion, DEQ was able to identify other regulatory issue, e.g., aquatic life criteria, upon which to base our removal and/or remedial groundwater actions.

As Jennifer noted, it would be helpful for us if EPA could lay out the scenario for which you envision the shallow groundwater beneath the river will be utilized for a domestic or public water supply. Much of sediment contamination in Portland Harbor is from direct disposal of waste into the river. This sediment contamination also results in contamination of the shallow groundwater beneath the river. This is the same shallow groundwater zone that the uplands groundwater plumes migrate. It has been perplexing to DEQ to understand the importance of controlling the upland groundwater plumes above MCLs or drinking water standards when the in-water FS and anticipated remedies do not evaluate sediment remedies to protect this use.

While Jennifer informed me that EPA may be moving away from the Mn human health ARAR as a PRG, I wanted to provide the following information on the Mn ARAR.

EPA in 2011 approved DEQ proposal to withdraw the human health criterion for Mn in freshwater (50 ug/L water and fish consumption and 100 ug/L fish consumption).

<http://www.deq.state.or.us/wg/standards/docs/toxics/EPAapprovalLtrFeMn.pdf>

Below is a link to the EPA technical document supporting the above approval.

<http://www.deq.state.or.us/wg/standards/docs/toxics/TSDocEPAapprovalFeMn.pdf>

I have also attached for reference the DEQ issues paper that is referenced in the EPA documents and a link to Table 340A which identifies the beneficial uses of the Willamette Basin.

<http://www.deq.state.or.us/wg/rules/div041/dbutables/table340a.pdf>

looking forward to the discussion this afternoon.

Matt McClincy
Oregon Department of Environmental Quality
Northwest Region
700 NE Multnomah St., Suite 600

Portland, Oregon 97232-4100

Phone 503-229-5538

Fax 503-229-6945